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Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

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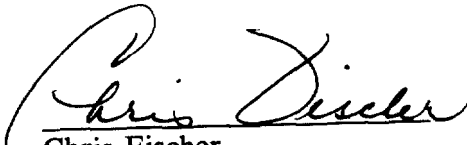
FCC MAIL ROOM

In the matter of Allocation of)
Spectrum Below 5 GHz) ET Docket No. 94-32
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COMMENT OF VALLEY COMMUNICATIONS CENTER - 911

VALLEY COMMUNICATIONS CENTER submits the following comments in response to the
above captioned Notice of Inquiry.

Respectfully Submitted by:


Chris Fischer
Director of Communications

June 10, 1994

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Valley Communications Center respectfully requests that the FCC allocate the 75 MHz of spectrum being requested by the Coalition of Private Users of Emerging Multimedia Technologies (hereinafter referred to as C.O.P.E.) as there is a major need for spectrum by the Public Safety and Private Land Mobile Community.

As the Commission is aware, there is an extreme shortage of available spectrum in the major metropolitan areas of the United States. This is particularly true in the growth areas of the Pacific Northwest where treaties with our Canadian neighbors limit the spectrum available to meet our ever growing demand for communications services, and urban growth has stretched available spectrum to the limits. Valley Communications Center has present and future communications needs that cannot be met without additional spectrum being made available to serve them.

Valley Communications Center (Valley Com) is an integrated public safety 911 dispatch center that serves a 230 square mile area in suburban King County south of Seattle. Valley Com provides public safety communications systems and services to 6 cities and several fire districts for a total of 16 police, fire and EMS agencies. The total population served is approximately 250,000 and this area of south King County is one of the fastest growing regions in the County and the State. Total dispatched calls for service are increasing at a rate of over 5% per year and last year a total of 213,000 emergency responses were handled from the Center.

Reliable, privately operated radio communications systems are the lifeblood of the public safety community. Our field personnel rely on their communications systems for their safety and productivity as they react to a growing and shifting demand for services from the public. Valley Com utilizes a number of radio communications systems to meet the needs of our public safety agencies, but are unable to provide emerging multimedia technologies due to the lack of available spectrum. These technologies are viewed as essential by our agencies as they seek ever improved ways to deliver service to their citizens and protect the safety of our public safety employees.

The FCC has recently allocated blocks of spectrum for carrier provided services. These spectrum allocations will not serve the unique needs of the public safety radio community in that their objectives are profit driven and consumer oriented. The needs of public safety agencies, who operate private radio systems with highly advanced technologies and high quality of service standards over large and sometimes sparsely populated areas, historically have not been taken into consideration in new allocations for emerging technologies.

We support C.O.P.E.'s assertion that the spectrum offered in the Notice of Inquiry-ET Docket No. 94-32 appears to be unsuitable for wide area private land mobile applications.

In conclusion, a spectrum allocation for advanced Private Land Mobile Communications Services is increasingly necessary and would greatly enhance the present and future operations of Valley Communications Center and other public safety and private radio system operators. We feel that the C.O.P.E. petition accurately outlines the overall need for this spectrum and the advantages to the Private Radio Community. We urge the FCC to allocate this much needed spectrum to accommodate Advanced Private Land Mobile Communications Services.